



**Service of Process
Transmittal**

11/09/2020

CT Log Number 538562996

TO: Andrew Pugh
FirstGroup America, Inc.
600 Vine St Ste 1400
Cincinnati, OH 45202-2426

RE: Process Served in Oregon

FOR: FIRST STUDENT, INC. (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Ryan Bartlett, etc., Pltf. vs. First Student, Inc., etc., and Clarence D. Haws, etc., Dfts.

DOCUMENT(S) SERVED: -

COURT/AGENCY: None Specified
Case # 20CV38368

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition

ON WHOM PROCESS WAS SERVED: C T Corporation System, Salem, OR

DATE AND HOUR OF SERVICE: By Process Server on 11/09/2020 at 15:03

JURISDICTION SERVED : Oregon

APPEARANCE OR ANSWER DUE: None Specified

ATTORNEY(S) / SENDER(S): None Specified

ACTION ITEMS: CT has retained the current log, Retain Date: 11/10/2020, Expected Purge Date: 11/15/2020

Image SOP

Email Notification, Andrew Pugh Andreww.Pugh@firstgroup.com

SIGNED: C T Corporation System
ADDRESS: 208 South LaSalle Street
Suite 814
Chicago, IL 60604

For Questions: 866-331-2303
CentralTeam1@wolterskluwer.com

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Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

Exhibit 1
Page 1 of 5

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

RYAN BARTLETT, an individual,

Plaintiff,

v.

FIRST STUDENT, INC., a Delaware corporation;
and CLARENCE D. HAWS, an individual,

Defendants.

Case No. 20CV38368

SUMMONS

TO: First Student, Inc.
c/o CT Corporation System, Registered Agent
780 Commercial St SE, Ste 100
Salem OR 97301

You are hereby required to appear and defend the complaint filed against you in the above entitled action within thirty (30) days from the date of service of this summons upon you, and in case of your failure to do so, for want thereof, plaintiff(s) will apply to the court for the relief demanded in the complaint.

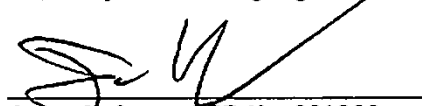
**NOTICE TO THE DEFENDANT: READ THESE PAPERS
CAREFULLY!**

You must "appear" in this case or the other side will win automatically. To "appear" you must file with the court a legal paper called a "motion" or "answer." The "motion" or "answer" must be given to the court clerk or administrator within 30 days along with the required filing fee. It must be in proper form and have proof of service on the plaintiff's attorney or, if the plaintiff does not have an attorney, proof of service upon the plaintiff.

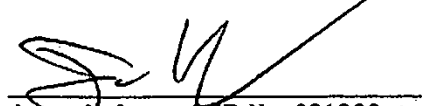
If you have any questions, you should see an attorney immediately. If you need help in finding an attorney, you may call the Oregon State Bar's Lawyer Referral Service at (503) 684-3763 or toll-free in Oregon at (800) 452-7636.

STATE OF OREGON)
) ss.
County of Multnomah)

I, the undersigned attorney of record for the plaintiff, certify that the foregoing is an exact and complete copy of the original summons in the above entitled action.


Jason Kafoury, OSB No. 091200, Attorney of Record for
Plaintiff

TO THE OFFICER OR OTHER PERSON SERVING THIS SUMMONS: You are hereby directed to serve a true copy of this summons, together with a true copy of the complaint mentioned therein, upon the individual(s) or other legal entity(ies) to whom or which this summons is directed, and to make your proof of service on the reverse hereof or upon a separate similar document which you shall attach hereto.


Jason Kafoury, OSB No. 091200, Attorney of Record for
Plaintiff

10/29/2020 2:43 PM
20CV38368

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3
4 IN THE CIRCUIT COURT OF THE STATE OF OREGON

5 FOR THE COUNTY OF MULTNOMAH

6 RYAN BARTLETT, an individual,

7 Plaintiff,

8 vs.

9 FIRST STUDENT, INC., a Delaware
10 corporation, and CLARENCE D.
HAWS, an individual,

11 Defendants.

Case No.

COMPLAINT FOR PERSONAL INJURY

NOT SUBJECT TO MANDATORY
ARBITRATION

JURY TRIAL DEMANDED

PRAYER: \$920,000
ORS 21.160(c)

12 Plaintiff Ryan Bartlett demands a jury trial and alleges:

13 1.

14 Defendant First Student, Inc. is a Delaware corporation conducting
15 regular and sustained business within Multnomah County in the State of
16 Oregon.

17 2.

18 At all times material herein, defendant Clarence D. Haws resided and
19 currently resides in Oregon, and was acting within the course and scope of his
20 employment or agency for First Student.

21 3.

22 On or about December 20, 2019, plaintiff was a pedestrian crossing NE
23 Columbia Blvd at the intersection with NE 60th Avenue when she was hit by a

PAGE 1 – COMPLAINT FOR PERSONAL INJURY

KAFOURY & McDOUGAL
411 SW Second Ave., Ste. 200
Portland, OR 97204
Fax: 503-224-2673
Phone: 503-224-2647

1 First Student bus and forced to the ground. The bus came to a stop while on
2 top of plaintiff's thigh/leg, and then backed up.

3 4.

4 The above-described incident was caused by the negligence of defendant
5 Haws in one or more of the following particulars:

- 6 a. Failing to yield the right of way to a pedestrian in a crosswalk;
7 b. Failing to stop and remain stopped for a pedestrian in a crosswalk;
8 c. Failing to keep a proper lookout;
9 d. Failing to maintain reasonable control over the bus.

10 5.

11 As a result of defendants' negligence, plaintiff suffered injuries to her left
12 thigh, which required surgery; fractured left fibula; fractured left ankle; 5-cm
13 and 7-cm lacerations of the left ankle; left foot injuries; left knee injuries; left
14 shin injuries; back and neck injuries; wrenching, stretching, twisting, and
15 tearing of the soft tissues about the spine; may have aggravated pre-existing
16 asymptomatic degeneration of the spine; and has suffered, continues to suffer,
17 and may permanently suffer from pain, anxiety, discomfort, disability, and
18 interference with ordinary activities, all to plaintiff's noneconomic damages not
19 to exceed \$850,000. This number may change, depending on whether
20 plaintiff's condition resolves, persists, or worsens.

21 6.

22 As a further result of the above-described accident and injury, plaintiff
23 has incurred medical expenses in the current amount of approximately

\$50,000. Plaintiff continues to treat for her injuries and agrees to amend for additional medical expenses and future medical expenses when she becomes medically stationary.

7.

As a further result of defendant's negligence, plaintiff lost income in the approximate sum of \$20,000. Plaintiff continues to treat for her injuries and reserves the right to amend her claimed lost income and loss of earning capacity when she becomes medically stationary.

WHEREFORE, plaintiff prays for judgment against defendants, and each of them, in the amount of \$850,000 in noneconomic damages, \$70,000 in economic damages, and for her costs and disbursements necessarily incurred herein.

Dated this 29th day of October, 2020.

KAFOURY & MCDUGAL

/s/ Jason Kafoury
 Mark McDougal, OSB #890869
 mcdougal@kafourymcdougal.com
 Jason Kafoury, OSB #091200
 jkafoury@kafourymcdougal.com

Attorneys for Plaintiff